

1 BEFORE THE STATE OF WASHINGTON
2 ENERGY FACILITY SITE EVALUATION COUNCIL
3
4

5 In the Matter of Application No. 2003-01
6

EXHIBIT 60 OPENING
STATEMENT (TU-T OS)

7 SAGEBRUSH POWER PARTNERS, L.L.C.
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10 KITTTITAS VALLEY WIND POWER
11 PROJECT
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14 **PREFILED OPENING STATEMENT**
15 **WITNESS #1 – TONY USIBELLI**
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17 Q According to EFSEC Prehearing Order No. 25, (page 6), in the Matter of Application
18 No. 2003-01, Judge Torem requested that parties review their opening statements to
19 ensure that they are clearly focused on the project before the Council and that parties
20 issues are summarized. What is your understanding of the Kittitas Valley Wind Power
21 Project that you are supporting with your testimony?

22 A I refer first to the applicant's outline of the project in the Second Request for
23 Preemption, Volume 1, Section 1, Executive Summary, December 29, 2006, paragraph
24 2, that we believe still represents the general scope of the project, together with a
25 subsequent reduction in the number of turbines. The project will include:
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- a. location on open ridge tops between Ellensburg and Cle Elum at a site approximately 12 miles northwest of the City of Ellensburg;
- b. a project area that consists of approximately 6,000 acres of contiguous, adjoining parcels of open range land located in areas that are zoned as Forest and Range and Agriculture-20;
- c. up to 65 wind towers with generating turbines (down from 80 in the cited paragraph), with a maximum height of approximately 410 feet, spaced for both safety and wind requirements;
- d. an electrical collection system;
- e. up to two substations;
- f. an access road and lay down pads (for tower construction);
- g. a number of permanent meteorological towers;
- h. a communications system; and
- i. operations and maintenance facilities (reasonably small buildings).

In the introduction to the Applicant's Second Request for Preemption, on page 2, paragraph 2, the applicant indicates that it has reduced the number of turbines from what was originally proposed, up to 121 towers, to the December 2006 proposal, up to 80 towers, to the current "maximum of 65 towers." We imagine that the project acreage may also have changed, due to the reduction in towers. We do not know if both substations may still be built, or if negotiations with the substation owners have led the applicant to a final determination of this issue.

I would like to underscore that we are neutral about many details of the final design. We believe the environmental impact of the initial 121 turbine proposal was significantly small – so the reduction in turbines is easy to support. We thought that 1000 foot setbacks was reasonable – enlargement to 1320 feet is better.

1 I also want to underscore the importance of allowing certain flexibility to the project.
2 The current market demand for wind turbines is so great, that it is not clear what size or
3 make of turbines will be available once a permit is granted. In addition, the exact
4 location of individual turbines is dependent on wind and geologic conditions. Suppose
5 in the construction of a tower site an unfavorable geologic condition is discovered.
6 This may require a different location for the turbine, requiring an adjustment in the
7 adjacent line of turbines. The applicant should not be required to test every potential
8 tower site to guarantee a good tower location. We support the applicant's request for
9 some flexibility. We also support the establishment of criteria as a framework for the
10 applicant. For example, the applicant should be able to adjust turbine locations while
11 maintaining a setback standard. We look to EFSEC to specify in a site certificate what
12 those terms and conditions should be, and what flexibility should be granted to the
13 applicant.
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17 Q. What issues will you address in your initial and supplemental testimony?

18 A I address four issues in my initial testimony and three issues in my supplemental
19 testimony.
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22 My initial testimony focuses on four major areas: 1) The role of wind and renewable
23 energy development with respect to state energy policy, 2) the large scale economic
24 benefits of wind development, 3) the environmental benefits of wind compared to other
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1 fossil fueled electricity production technologies, and 4) electricity system benefits of
2 wind projects.

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4 In sum, the state supports the development of wind energy; wind energy can provide
5 large economic benefits to the state; wind energy is clean compared to its fossil fuel
6 alternatives; and wind energy will help improve the reliability of Washington state's
7 electricity system. All of these are strong reasons to support wind in general, and the
8 Kittitas Valley Wind Power Project in particular.
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11 My supplemental testimony focuses on three areas related to the issue of land use
12 consistency preemption by EFSEC: 1) that the excellent nature of the Kittitas Valley
13 project highly recommends it for a site certificate regardless of noncompliance, 2) that
14 far too much time has passed and that EFSEC should complete its adjudication and
15 make a recommendation to the Governor quickly, and 3) that the applicant has made all
16 reasonable efforts in good faith to resolve the noncompliance as required by the
17 relevant chapters of administrative code.
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20 In sum, that preemption (if it is ever granted) should be granted to the best projects, of
21 which Kittitas Valley is one; that non-compliance in this case is a technicality that has
22 resulted in the waste of significant public and private resources and threatened the
23 viability of the project, so preemption should be granted quickly and a permitting
24 decision made; and that the applicant has met the requirements of statute and rule to
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1 address local noncompliance and therefore qualifies for preemption. All of these
2 support preemption.
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